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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ARTURO GARCIA;

Plaintiff,

vs.

AmGUARD INSURANCE COMPANY a
Foreign Limited Liability Company licensed
to do business in the State of Nevada; ROE
CORPORATIONS I through X, inclusive;
and DOES I through X, inclusive,

Defendants.

2:22-cv-01633-ART-VCF

**AGREED MOTION TO EXTEND
ANSWER DEADLINE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE ANNE R. TRAUM:

Plaintiff Arturo Garcia ("Plaintiff") and Defendant AmGuard Insurance Company ("AmGuard") file this Agreed Motion to Extend Answer Deadline, respectfully requesting this Court allow the parties until October 17, 2022 to either file a notice of settlement with the Court or for Defendant to Answer the Complaint, and in support thereof, state as follows:

AGREED MOTION TO EXTEND ANSWER DEADLINE

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1 1. On September 26, 2022, AmGuard removed this matter from the District Court of
2 Clark County, Nevada, to the United States District Court for the District of Nevada (Dkt. 1).
3 AmGuard's current Answer deadline is October 3, 2022.

4 2. The parties are actively engaged in settlement negotiations and have made
5 substantial progress towards settling this matter without the need for further litigation. The
6 parties are working diligently to achieve settlement without the need for additional costs and
7 expenses of further litigation, and believe settlement may be achieved before October 17, 2022.

8 3. For these reasons, the parties jointly request that the Court extend AmGuard's
9 Answer deadline until October 17, 2022, by which date the parties will either file notice of
10 settlement or AmGuard will answer the Complaint.

11 4. This agreement does not preclude Plaintiff from filing a motion to remand the case to
12 State Court.

13 Dated: September 30, 2022

Respectfully submitted,

14 **WILSON, ELSEER MOSKOWITZ,**
15 **EDELMAN & DICKER, LLP**

16 By: /s/I-Che Lai
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-AND-

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 Attorneys for Plaintiff Arturo Garcia

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(b), I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on September 30, 2022, I served a true and correct copy of the foregoing **AGREED MOTION TO EXTEND ANSWER DEADLINE** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada; and/or
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk; and/or
- ☐ via hand-delivery to the addressees listed below; and/or
- ☐ via facsimile; and/or
- ☐ by transmitting via email the document listed above to the email address set forth below on this date before 5:00 p.m. (PST/PDT).

By: /s/Annemarie Gourley
An Employee of WILSON ELSER MOSKOWITZ
EDELMAN & DICKER LLP

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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Defendants.

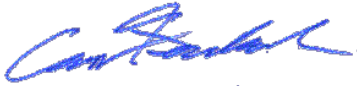
2:22-cv-01633-ART-VCF

ORDER GRANTING
AGREED MOTION TO EXTEND
ANSWER DEADLINE

After considering Plaintiff Arturo Garcia and Defendant AmGuard Insurance Company's Agreed Motion to Extend Answer Deadline, the Court finds that the motion should be GRANTED.

The Court orders that Defendant AmGuard Insurance Company's deadline to Answer the Complaint is October 17, 2022.

IT IS SO ORDERED.



Cam Ferenbach
United States Magistrate Judge

10-6-2022

DATED